

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

UNITED RESOURCE RECOVERY
CORPORATION,

Plaintiff,

vs.

RAMKO VENTURE MANAGEMENT,
INC.and JOHN KOHUT,

Defendants.

Case Number: 7:07-502-HFF

**DEFENDANTS' NOTICE OF
MOTION AND MOTION TO
TRANSFER**

RAMKO VENTURE MANAGEMENT,
INC.,

Third-Party Plaintiff,

vs.

CARLOS GUTIERREZ,

Third-Party Defendant.

YOU WILL PLEASE TAKE NOTICE that the Defendants, RamKo Venture Management, Inc. ("RamKo") and John Kohut, ("Kohut"), by and through their undersigned attorney, will move before the Honorable Henry F. Floyd, United States District Judge, United States District Court, at the Federal Courthouse, 201 Magnolia Street, Spartanburg, South Carolina, on the tenth day after service hereof, or as soon thereafter as Defendants may be heard, for an Order transferring this case from the District of South Carolina, Spartanburg

Division, to the Southern District of New York, pursuant to 28 U.S.C. §1404 (a).

The grounds in support of the motion are more fully explained and set forth in the accompanying memorandum and attached exhibits submitted in support of the motion. The motion is also based upon the pleadings, and such affidavits, information and arguments that may be submitted to the Court prior to or at the hearing. Further, this motion is based upon the applicable law, and the furtherance of justice.

DUTY OF CONSULTATION

Pursuant to Local Rule 7.02, Movants' counsel submits that the above motion to transfer the case to another district is exempted from the consultation rule, 7.02 (D), because it is a dispositive motion and if granted would rid this Court of jurisdiction in the matter.

Respectfully submitted,

By: s/Julianne Farnsworth

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ATTORNEY FOR THE DEFENDANTS

April 4, 2007
Charleston, South Carolina